

**From:** [3dots Studio](#)  
**To:** [IPCN Enquiries Mailbox](#)  
**Subject:** Narrabri Gas Project submission in response to Proponent's response to public submissions.  
**Date:** Friday, 21 August 2020 1:59:19 PM

---

Dear Commissioners,

Thank you for the opportunity to respond to the Narrabri Gas Project Proponent's response to public submissions.

Since my original submission, I have reviewed the Proponent's response to Public Submissions.

The proposition made by the Proponent severely minimises the potential risks and accentuates highly speculative benefits.

Some of the extreme variations between the original Project proposal estimates and the Proponent's new submission only serves to emphasise the uncertain outcomes of this Project.

Volatility of the methane gas market further highlights the inappropriate use of the "steady state model" assumptions, by both the Proponent and the Department.

I was unimpressed by statements of the Proponent's Senior Counsel, who seemingly minimises the imperative of the IPC to make determinations in favour of the Public Interest, particularly in relation to Ecologically Sustainable Development (ESD), Intergenerational Equity and the Precautionary Principle.

As a public institution making a determination on behalf of the people of NSW, the IPC must not take uncertain and unnecessary risks with groundwater quantity and quality, fugitive methane emissions and intergenerational equity.

I must also state that I am highly concerned by the recent IPC determination on the Vickery Extension Project, whereby the Commission has publicly stated:

"The Commission notes there is no fit and proper person test in respect of development consents and that matters such as the identity of an applicant or past planning law breaches have been found to be irrelevant considerations for consent authorities such as the Commission."

How does the Commission propose to be building public trust with such obvious deficiencies in due process?

I remain opposed to the Narrabri Gas Project in its entirety.

Thank you Commissioners.

Kind Regards,

Peter Dowson  
Centennial Park, NSW